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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LISA A. BRYANT,

: Case No.: 2:20-cv-00594-JAD-EJY

Plaintiff,

:

v.

:

MADISON MANAGEMENT SERVICES,
LLC, and WALDMAN & PORRAS, PLLC,

: **[PROPOSED] STIPULATION AND
ORDER TO EXTEND DISCOVERY**

Defendants.

: [SECOND REQUEST]

Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiff, Lisa Bryant, and Defendants, Madison Management Services, LLC, and Waldman & Porras, PLLC, (collectively known as the "Parties) by and through their attorneys, hereby stipulate to stay all discovery deadlines and other

1 deadlines in the February 1, 2021 Scheduling Order (ECF No. 39) as follows:

2 **1. Completed Discovery.**

3 The parties have exchanged initial disclosures. Parties have served written discovery.

4 **2. Remaining Discovery.**

5 Written discovery responses from Plaintiff and the parties' depositions.

6 **3. Good Cause.**

7 A Discovery Plan and Scheduling Order was approved by the Court on February 1, 2021.
8 (ECF No. 39). On February 25, 2021, the Court approved a Stipulation and Order to Stay
9 Discovery and Schedule Settlement Conference. (ECF NO. 41). The Court entered an Order
10 Setting Settlement Conference on February 26, 2021, which, among other things, scheduled a
11 mediation conference for March 30, 2021. (ECF No. 42). On March 25, 2021, the Court approved
12 an Agreed Stipulation for Continuance of Settlement Conference and Due Date for Confidential
13 Settlement Statement, which, among other things, scheduled a mediation conference for June 11,
14 2021. (ECF NO. 43). The parties attended the mediation on that day, but were unable to agree to
15 a resolution. Regarding the proposed discovery deadlines, the Parties have used the June 11, 2021
16 mediation conference as the date to calculate the proposed discovery deadlines. This stipulation
17 is made in good faith, is not interposed for delay, and is not filed for an improper purpose.
18 Furthermore, a trial date has not been set at this time.

19 **4. Current Discovery Deadlines.**

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- Discovery Cutoff: **August 5, 2021**
 - Deadline to Amend Pleadings: **May 17, 2021**
 - Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**
 - Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**
 - Dispositive Motion Deadline: **September 15, 2021**

- 1 • Joint Proposed Pretrial Order: **October 16, 2021**
- 2

3 **5. Proposed Discovery Deadlines.**

4

- 5 • Discovery Cutoff: **December 8, 2021**
- 6 • Deadline to Amend Pleadings: **September 9, 2021**
- 7 • Deadline to Disclose Initial Expert Disclosures: **October 11, 2021**
- 8 • Deadline to Disclose Rebuttal Expert Disclosures: **November 10, 2021**
- 9 • Dispositive Motion Deadline: **January 4, 2022**
- 10 • Joint Proposed Pretrial Order: **February 3, 2022**

11 WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause
12 supports this request to extend discovery;

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1 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
2 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

3 The February 1, 2021 Scheduling Order (ECF No. 39) shall be amended as follows:

- 4
- 5 • Discovery Cutoff: **December 8, 2021**
 - 6 • Deadline to Amend Pleadings: **September 9, 2021**
 - 7 • Deadline to Disclose Initial Expert Disclosures: **October 11, 2021**
 - 8 • Deadline to Disclose Rebuttal Expert Disclosures: **November 10, 2021**
 - 9 • Dispositive Motion Deadline: **January 4, 2022**
 - 10 • Joint Proposed Pretrial Order: **February 3, 2022**

11 **IT IS SO STIPULATED.**

12 DATED: February 22, 2021

13 DATED: February 22, 2021

14 FREEDOM LAW FIRM, LLC

15 WALDMAN & PORRAS, PLLC

16 By: /s/ George Haines

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30 MADISON MANAGEMENT SERVICES,
31 LLC, AND PORRAS, PLLC

32 By: /s/ Marc E. Dann

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37 *Counsel for Plaintiff Lisa A. Bryant*

ORDER GRANTING
STIPULATION TO EXTEND DISCOVERY

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED**
THAT the February 1, 2021 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **December 8, 2021**
 - Deadline to Amend Pleadings: **September 9, 2021**
 - Deadline to Disclose Initial Expert Disclosures: **October 11, 2021**
 - Deadline to Disclose Rebuttal Expert Disclosures: **November 10, 2021**
 - Dispositive Motion Deadline: **January 4, 2022**
 - Joint Proposed Pretrial Order: **February 3, 2022**

IT IS SO ORDERED.

Eayna J. Zouchah
UNITED STATES MAGISTRATE JUDGE

Dated: July 15, 2021